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VIA CM/ECF & E-MAIL

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The Honorable David S. Doty
United States District Court of Minnesota
316 North Robert Street
St. Paul, MN 55101

Re: Walsh, et al. v. Buchholz, et al., Civil No. 0:19-cv-1856 (DSD/HB)

Dear Judge Doty,

The undersigned represents Defendants Frank Ramirez, Brent Keele, Stephen Tebo, Jerry Morgensen, James Parke, Joseph Scofield, III, St. Renatus, LLC and SR Merger Sub, LLC (collectively, the “St. Renatus Defendants”) in the above-referenced lawsuit. Pursuant to the Amended Scheduling Order (Doc. 104), the St. Renatus Defendants will be filing a Motion for Summary Judgment on or before July 8, 2022. The St. Renatus Defendants submit this letter to respectfully request an expansion of the 12,000 word limit applicable to the Memorandum of Law in support of the St. Renatus Defendants’ Motion for Summary Judgment pursuant to LR 7.1(f)(1)(D).

Rather than file separate Summary Judgment Motions and Memoranda of Law for each of the eight St. Renatus Defendants, the St. Renatus Defendants intend to file a combined Motion for Summary Judgment and related brief. Further, the record is voluminous as there have been 25 fact witness depositions, 7 expert witness depositions, and over 330 deposition exhibits marked in this case. Given the scope of the factual record and expert discovery, as well as the intent to combine the briefing of eight Defendants into a single combined brief, the St. Renatus Defendants respectfully request a total of 24,000 words for their combined Motion for Summary Judgment, which pursuant to LR 7.1, will include any Reply brief.

Sincerely,

/s/ *Suzanne Jones*

Suzanne L. Jones

cc: All counsel of record